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*Office of the President*

April 21, 2014

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: In the Matter of Modernizing the E-Rate Program for Schools and Libraries,  
WC Docket No. 13-184.

Dear Ms. Dortch:

Alabama Institute for Deaf and Blind (AIDB) respectfully submits these comments in response to the March 6, 2014, Public Notice released by the Federal Communications Commission (FCC) requesting further comment on modernization of the E-rate program.

AIDB has been fortunate to benefit from E-Rate support and respectfully thanks those within the FCC and Schools and Libraries Division (SLD) for their exceptional work. Likewise, AIDB has invested time, talent and resources to ensure its technological infrastructure supports the goals and objectives of the SLD and FCC while providing for the distinct needs of staff and students who are deaf, hard-of-hearing, blind, low-vision, deaf-blind and multiply-disabled. In fact, AIDB recently partnered with the Alabama Department of Economic and Community Affairs (ADECA) to implement a U.S. Department of Commerce initiative to boost broadband usage, adoption, and subscribership in Alabama's rural areas and among its most vulnerable populations. Thus, in review of Docket No 130184, it is AIDB's opinion that the elimination of E-Rate support for voice services, including Plain Old Telephone System (POTS) and wireless services, will not contribute to the Commission's stated goal of expanding broadband penetration in schools and libraries. In fact, the continuation of voice services will only enhance the expansion of broadband.

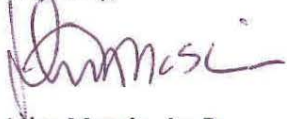
Cellular and POTS voice services is especially critical to the safety, security and instructional needs of almost 400 AIDB students annually experiencing sensory loss and/or multiple disabilities. Like many schools across the nation, AIDB uses wireless voice service to communicate within the school's campuses – the Alabama School for the Blind, Alabama School for the Deaf and Helen Keller School of Alabama – and to communicate with school buses while they are transporting students daily, weekly and literally across the state on weekends. Broadband and Voice over Internet Protocol (VoIP) are not currently adequate substitutes for this type of critical communication and it is unlikely they will become so for many years in rural Alabama.

Moving E-Rate funds from support of traditional voice services to support broadband expansion will not result in the outcome the Commission desires. In most instances, funding is a zero-sum game for most schools. If the voice services schools desire no longer receive E-Rate support, schools are left with little choice but to offset this change by reducing the amount they otherwise planned to spend elsewhere, including broadband expansion, which would be a real travesty. Centralized planning is inefficient and cannot take into account the rich diversity of school systems throughout the United States –like AIDB.

If the FCC nonetheless decides to end support for wireless voice/POTS services, schools and libraries, AIDB respectfully requests that the FCC consider permitting schools and libraries to continue using support indefinitely, (i.e. "grandfathered" ), for such services, and without needing to incur the burden of applying for a waiver. Also, grandfathered support should be allowed to grow over time as the cost of, or local need for, the grandfathered services increases.

For the reasons set forth above, I respectfully urge the Commission to preserve and even expand support for full array wireless voice and POTS services. If the Commission nevertheless chooses to phase out support for wireless voice/POTS services despite clear record evidence that they are "integral, immediate and proximate" to the safety and education of students, particularly those with sensory and multiple disabilities in rural areas, the Commission should grandfather wireless voice/POTS services for both existing and similarly situated schools and libraries.

Sincerely,

A handwritten signature in dark ink, appearing to read "John Mascia", written over a faint horizontal line.

John Mascia, Au.D.  
President